

Andrew T. Solomon  
Gretchen S. Silver  
SULLIVAN & WORCESTER LLP  
1290 Avenue of the Americas, 29<sup>th</sup> Fl.  
New York, NY 10104  
(212) 660-3000

*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
	:	
PROFESSIONAL OFFSHORE	:	
OPPORTUNITY FUND, LTD., a company	:	11-cv-04321-LAK
registered under the laws of the British Virgin	:	
Islands,	:	
	:	<b>REPLY DECLARATION OF</b>
Plaintiff,	:	<b>ANDREW T. SOLOMON</b>
	:	
-against-	:	
	:	
HUIFENG BIO-PHARMACEUTICAL	:	
TECHNOLOGY, INC., a Nevada corporation,	:	
	:	
Defendant.	:	
	:	
-----	X	

ANDREW T. SOLOMON, pursuant to 28 U.S.C. § 1746, declares:

1. I am a partner with the law firm of Sullivan & Worcester LLP (“S&W”), counsel to the Plaintiff Professional Offshore Opportunity Fund, Ltd. (“PROOF”). I make this declaration, based on my personal knowledge, in further support of Plaintiff’s motion for summary judgment against Huifeng Bio-Pharmaceutical Technology, Inc. (“HFGB”).

2. In its opposition to the instant motion, HFGB cites a number of state and federal court case in New York in which PROOF is a party. Taking the case cited, I prepared the chart below to demonstrate the interstate (as opposed to intrastate) nature of PROOF’s investment business. I

note that S&W was involved (and I supervised) aspects of all of these litigations or the transactions (except National Maintenance Group).

#### **PROOF LAWSUITS INVOLVING INVESTMENTS**

Plaintiff	Defendant	Index No.	Court	D. Place of Formation	D. Principal Place of Business	Source
PROOF	Franklin Tower Enterprises Inc.	08 CV 3767(DC)	SDNY	Nevada	New Hampshire	PACER
PROOF	Amerex Group, Inc.	08 CV 5643 (SS)	SDNY	Delaware		PACER
PROOF	Zealous Trading Group	650260/2008	NY County	Nevada	California	EDGAR
PROOF	National Maintenance Group	601039/2009	NY County	Delaware	Arizona	OTC Pink Sheets
PROOF	Infosmart Group, Inc.	112894/2010	NY County	California	Hong Kong	EDGAR
PROOF	Global Home Group, LLC	023805/2009	Suffolk County	New York	New York	S&W Files
PROOF	Lloyd J. Braider	008296/2011	Suffolk County	New York	New York	S&W Files

3. I used the following sources of information to prepare the chart:

- a. Public Access to Court Records (“PACER”) located at <http://www.pacer.gov/>.
- b. U.S. Securities and Exchange Commission’s EDGAR database (“EDGAR”) located at <http://www.sec.gov/edgar.shtml>.
- c. OTC.com’s Pink Sheets (“OTC Pink Sheets”) located at <http://otc.com/>
- d. Sullivan & Worcester LLP’s files (“S&W Files”), including the underlying pleadings in each action stored there.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
December 5, 2011

/s/ \_\_\_\_\_  
Andrew T. Solomon